

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ROBERT PIERANUNZI,)
)
Plaintiff,)
) Case No. 12 cv 6812
vs.)
) District Judge Feinerman
ROADLINK USA MIDWEST, LLC, and)
ROADLINK USA, INC.)
)
Defendants.)

**MOTION FOR ENTRY OF JUDGMENT AGAINST DEFENDANTS PURSUANT TO
STIPULATION AND AGREED ORDER**

Plaintiff, ROBERT PIERANUNZI, by and through his attorneys, GARFIELD & MEREL, LTD., for his Motion for Entry of Judgment against Roadlink USA Midwest, LLC and Roadlink USA, Inc. and in support thereof states as follows:

1. Plaintiff filed suit in this matter on August 24, 2012.
2. Thereafter, on December 10, 2012, pursuant to a Confidential Settlement Agreement between the parties, this Court entered an Agreed Order of Dismissal (see Exhibit A).
3. The Dismissal Order provided for, among other things, that:
 - a. The parties were to comply with the terms of the settlement;
 - b. The Court retained jurisdiction to enforce the terms of the settlement; and
 - c. Any party may bring a motion on or before July 30, 2013 to enforce the terms of the settlement agreement.
4. The Confidential Settlement Agreement provided, in part, that:
 - a. The case shall settle by the making of payments by Defendants to Plaintiff.

- b. In the event any of the required payments are not timely received, Plaintiff shall give notice of default, notifying Defendants that they have 14 days to cure said default.
 - c. In the event Defendants do not cure the default, Plaintiff shall have the right to enter immediate judgment against Defendants for the unpaid balance of the settlement by entering a consent judgment, in the form attached to the Confidential Settlement Agreement.
5. On January 23, 2013 counsel for Plaintiff sent correspondence to counsel for Roadlink advising that a monthly payment required in January had not been received and that Defendants had 14 days to cure their default (see Exhibit B).
6. As of the filing of this Motion, Defendants are and remain in default. Accordingly, the Plaintiff is entitled to entry of the Judgment against Defendants in the form and in the amount attached hereto as Exhibit C.

REQUEST FOR RELIEF

Plaintiff, Robert Pieranunzi, prays that this Court enter the attached Stipulation and Agreed Order Entering Judgment Against Defendants, Exhibit C, and for such other relief as this court deems just and equitable.

ROBERT PIERANUNZI

By: s/Keith A. Chadwick

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